EXHIBIT A

DECLARATION OF VINCE CARNEVALE

1. My name is Vince Carnevale. I am over the age of 21 and fully competent to make this declaration. I am employed by the firm of Crivella West Incorporated (herein after "Crivella West"), in the capacity of Attorney/Analyst. I have been employed with Crivella West for seven (7) years. Crivella West is a technology firm that specializes in, among other things, the processing, handling, and advanced searching of substantial document productions in major litigations. I have personal knowledge of the statements contained in this declaration, which is being submitted in support of Plaintiffs' Response to Ethicon's Motion for Protective Order on the subject of the production of Ethicon's foreign documents. All statements in the declaration are true and represent the state of the production as of August 26, 2013.

2. To date, AMS has produced responsive documents from a substantial number of foreign countries, including but not limited to, ex-US material and documents from: Latin America, Australia, Brazil, Canada, Croatia, Czech Republic, Estonia, France, Germany, Austria, Greece, Hungary, Ireland, Israel, Japan, Netherlands, Poland, Romania, Singapore, Sweden, the United Kingdom and Serbia.

3. To date, AMS has produced no less than 175,273 documents from foreign countries, totaling in excess of 1,240,000 pages.

4. AMS' total production to date is approximately 1,837,000 documents totaling approximately 10, 333,000 pages.

5. Ethicon's total production to date is approximately 1,500,000 documents totaling approximately 9,740,000 pages.

Pursuant to 28 U.S.C. Sec. 1746, I declare under penalty of perjury that the foregoing is true and correct. This declaration is executed on August 26, 2013.

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Vince Carnevale